

Effective date 25th May 2018

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## 1 Introduction

This notice describes how Lloyd's, as a data controller, collects, uses, shares and retains the personal information you provide and informs you about your choices regarding use, access and correction of your personal information. Lloyd's is committed to ensuring that any personal data it receives is protected and handled in accordance with applicable data protection laws.

For the purposes of this Privacy Notice, references to "we", "us" or "our" shall refer to Lloyd's.

## 2 Who we are

The Society of Lloyd's (**Lloyd's**) is incorporated by Lloyd's Acts 1871 to 1982 whose principal place of business is at One Lime Street, EC3M 7HA.

## 3 What personal information we process about you.

**International Regulatory Non-Compliance Casework Management** - the personal information we hold is restricted to the names and contact details on Lloyd's policyholders who hold Lloyd's policies that are subject to international regulatory compliance issues. We also hold names, contact details and the identity of the employers for individuals working in the Lloyd's market, for insurance intermediaries and regulators.

**Defence & Development of Licences & Trading Rights** – the personal information we hold is restricted to your name, and contact details and in some cases professional biographies.

**Management & Oversight of International Regulatory Reporting** – the personal information we hold is restricted to your name, contact details or member number.

**Provision of International Regulatory Compliance Advice (includes oral and written)** – the personal information we hold is restricted to your name and contact details.

**Regulatory Stakeholder Relationship Management** - the personal information we hold is restricted to your name, contact details and in some cases professional biographies.

## 4 Why we collect your personal information and the lawful basis for processing.

**International Regulatory Non-Compliance Casework Management** - your personal information will be processed to manage non-compliance risks to Lloyd's brand, licences, trading rights and regulatory relationships. The lawful basis for processing your data is a legitimate interest of Lloyd's and its various stakeholders has to develop and maintain licences and trading rights, to enable it to write business in other jurisdictions.

**Defence & Development Licences & Trading Rights** – your personal information will be processed to manage Lloyd's licences, trading rights and regulatory relationships. The lawful basis for processing your data is a legitimate interest of Lloyd's and its various stakeholders has to develop and maintain licences and trading rights, and to enable it to write business in other jurisdictions. It is also in the legitimate interests of the international regulators and Lloyd's market participants to facilitate the servicing of trading rights and licences and so they can be contacted regarding relevant regulatory issues.

**Management & Oversight of International Regulatory Reporting** – your personal information will be processed to manage Lloyd's licences and regulatory relationships. The lawful basis for processing your data is a legitimate interest of Lloyd's and its various stakeholders has to develop and maintain licences and trading rights, and to enable it to write business in other jurisdictions.

**Provision of International Regulatory Advice (includes oral and written)** – your personal information will be processed to allow Lloyd's to deliver the international trading advice service to you. The lawful basis for processing your data is a legitimate interest of Lloyd's and its various stakeholders has to provide consistent and up-to-date international trading advice.

**Regulatory Stakeholder Relationship Management** - your personal information will be processed to manage government and regulatory relationships to support Lloyd's global market access and commercial objectives and to manage regulatory and reputational risk within Lloyd's risk appetite. The lawful basis for processing your data is a legitimate interest of Lloyd's and its various stakeholders has to develop and maintain licences and trading rights and to enable it to write business in other jurisdictions. It is also in the legitimate interests of the international regulators and Lloyd's market participants to facilitate the servicing of trading rights and licences and so they can be contacted regarding relevant regulatory issues. It may also be in your legitimate interest to be invited to Lloyd's International Regulators' Programme or regional conferences to learn about the operations of Lloyd's and to gain an insight into the Lloyd's insurance market.

## **5 Who we are sharing your data with**

**International Regulatory Non-Compliance Casework Management** – your data will be shared internally (includes other Lloyd's offices and Lloyd's subsidiary offices) with the relevant business area and with Lloyd's underwriting agents, Lloyd's brokers, insurance intermediaries and regulatory or government bodies as appropriate, in order to resolve the non-compliance issue.

**Defence & Development of Licences & Trading Rights** – your data will be shared internally (includes other Lloyd's offices and Lloyd's subsidiary offices) and with external regulatory/government bodies, as appropriate for defence/development purposes.

**Management & Oversight of International Regulatory Reporting** – Your data will be shared internally (includes other Lloyd's offices and Lloyd's subsidiary offices) and with external regulatory/government bodies, as required for reporting purposes.

**Provision of International Regulatory Advice (Includes oral and written)** – Your data will be shared internally (includes other Lloyd's offices and Lloyd's subsidiary offices).

**Regulatory Stakeholder Relationship Management** - Your data will be shared internally (includes other Lloyd's offices and subsidiary offices) with the relevant business area, and with external regulatory/government bodies and external service providers, as appropriate.

## **6 How long we keep your data**

We will retain your personal information for as long as is reasonably necessary to fulfil the relevant purposes set out in this Privacy Notice. The retention period will primarily be determined by relevant legal and regulatory obligation and/or duration of our business relationship with you, your employer or another associated party. We maintain and update regularly our data retention policy with a detailed retention schedule. We will securely delete or erase your personal information if there is no valid business reason for retaining your data. In exceptional circumstances, we may retain your personal information for longer periods of time if we reasonably believe there is a prospect of litigation, in the event of any complaints or there is another valid business reason the data will be needed in the future.

## **7 International transfers**

From time to time we may need to share your personal information with members of the Lloyd's subsidiaries who may be based outside of the European Union. We may also allow our service providers, who may be located outside the EU, access to your personal information. We may also make other disclosures of your personal information overseas, for example if we receive a legal or regulatory request from a foreign law enforcement body.

We will always take steps to ensure that any international transfer of information is carefully managed to protect your rights and interests:

- We will only transfer your personal information to countries which are recognised as providing an adequate level of legal protection or where we can be satisfied that alternative arrangements are in place to protect your privacy rights.
- Transfers within the Lloyd's overseas offices will be covered by standard contractual clauses, adopted by the European Commission which gives specific contractual protections designed to ensure that your personal information receives an adequate and consistent level of protection.
- Transfers to service providers and other third parties will always be protected by contractual commitments and where appropriate further assurances.
- Any requests for information we receive from law enforcement or regulators will be carefully checked before personal information is disclosed.

Information relating to the safeguards in place for all international transfers can be obtained by writing to the DPO, whose details can be found in section 9.

## **8 Your rights**

You have certain rights as an individual which you can exercise in relation to the information we hold about you. If you make a request to exercise any of your rights we reserve the right to ask you for a proof of your identity. We aim to acknowledge your request as soon as possible and will address your request within one month from your request.

You have the following rights:

### **The right to access**

You are entitled to a confirmation whether we are processing your data, a copy of your data, and information about purposes of processing, who do we disclose it to, whether we transfer it abroad and how we protect it, how long we keep it for, what rights you have, where we got your data from and how you can make a complaint.

### **The right to rectification**

If you believe the personal information we hold about you is inaccurate or incomplete you can request for it to be rectified.

### **The right to erasure**

If you withdraw your consent, terminate a contract with us or you believe the personal information is no longer necessary for the purposes for which it was collected, you may request your data to be deleted. However, this will need to be balanced against other factors, for example there may be certain regulatory obligations which mean we cannot comply with your request.

### **The right to restriction of processing**

You can ask us to restrict (i.e. keep but not use) your personal data, but only where:

- Its accuracy is contested, to allow us to verify its accuracy; or
- The processing is unlawful, but you do not want it erased; or
- It is no longer needed for the purposes for which it was collected, but we still need it to establish, exercise or defend legal claims; or
- You have exercised the right to object, and verification of overriding grounds is pending.

We can continue to use your personal data following a request for restriction, where we have your consent; to establish, exercise or defend legal claims; or to protect the rights of another natural or legal person.

### **The right to data portability**

If we collected your information under a contract or your consent, you can request from us to transfer your personal information to provide it to another third party of your choice.

### **The right to object**

You have the right to object at any time to processing of your personal data where processing is necessary for the performance of a task carried out in the public interest, or in the exercise of an official authority vested in the controller. You may also object where the processing is necessary for the purposes of the legitimate interests, except where such interests are overridden by your interests or fundamental rights and freedoms, in particular where you are a child.

## **9 Contact details of the Data Protection Officer**

If you have any questions relating to data protection that you believe we will be able to answer, please contact our Data Protection Officer:

**Data Protection Officer**

Lloyd's  
1 Lime Street  
EC3M 7HA, London

Email: [data.protection@lloyds.com](mailto:data.protection@lloyds.com)

**10 Complaints**

If you are not satisfied with our response or believe we are not processing your personal data in accordance with legal requirements you can make a complaint to relevant Data Protection Authority. Our Lead Authority within the European Union is the UK Information Commissioner's Office (<https://ico.org.uk/concerns/>).